

Remedium

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Robert J. Medler
Director
Remedium Group, Inc.

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U.S. Environmental Protection Agency
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Attn.: Ms. Bonita Lavelle

Subject: OU3 RI/FS of the Libby Asbestos Site
Monthly Progress Report – March 2009

Dear Bonnie:

This progress report describes work completed during the month of March 2009, in accordance with Section IX of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study dated September 2007. A discussion of the actions taken, sampling results, planned activities, modifications, problems encountered, potential issues, anticipated delays, and solutions developed is provided below. Information by contractor is reported separately.

MWH

The following is a summary of the actions taken and progress made during the month of March.

A. ACTIONS TAKEN

- Located and evaluated air-sampling pumps for use in activity-based sampling (ABS) during the Phase III RI.
- Participated in teleconferences on the draft Phase III Sampling and Analysis Plan.

B. SAMPLING RESULTS

As of March 31, all LA analytical results and re-issued, lab-corrected LA analytical reports, QA/QC reports, and photomicrographs for Phase I and Phase II samples had been issued by the analytical laboratories.

C. PLANNED ACTIVITIES FOR NEXT TWO MONTHS

The following tasks are scheduled to be performed over the next two months.

- Continue preparation of initial sections (i.e., Introduction, Study Area Investigations, Physical Characteristics of the Study Area and Nature and Extent of Contamination) of the OU3 Remedial Investigation Report.
- Prepare for and perform an evaluation of air-sampling pumps under actual field conditions at OU3. The evaluation will be performed as soon as snowmelt and

soil drying are sufficient to allow access to forest and logging roads under dusty conditions.

- Perform field reconnaissance to evaluate the feasibility of performing the ABS script at 20 locations proposed by EPA. If conditions at any of the proposed locations will prevent the ABS script from being safely and fully performed, locate suitable nearby alternate locations for EPA consideration.
- Conduct a field tour of the OU3 study area with EPA and its contractors, as discussed during meetings on February 5 at EPA Region 8 headquarters in Denver. The tour will focus on areas outside the mine site, in portions of OU3 proposed for ABS as part of Phase III investigations. The tour will be conducted as soon as snowmelt permits, after field reconnaissance of proposed ABS locations (estimated to be in late May or early June 2009).
- Continue researching air sampling pumps and other equipment required for ABS sampling.
- Make preparations for and conduct a field investigation (as soon as snowmelt permits) to characterize the nature of step-like topography on the "over-steepened" slope above and east of the Tailings Dam left abutment.
- Participate in teleconferences and other meetings as requested by EPA.

D. MODIFICATIONS/PROBLEMS ENCOUNTERED/POTENTIAL
ISSUES/ANTICIPATED DELAYS/SOLUTIONS DEVELOPED/IMPLEMENTED

- None.

Parametrix

The following is a summary of the actions taken and progress made during the month of March for Phase II C activities.

A. ACTIONS TAKEN

- Submitted Final Rainbow Trout bioassay report to EPA;
- Submitted Draft Phase 1 draft sediment bioassay reports (*Hyaella*, *Chironomid*) to EPA;
- Finalized and submitted Final Phase1 sediment bioassay reports (*Hyaella*, *Chironomid*) to EPA;
- Conducted statistical and other data analyses with Libby surface water data to support selection of maximum test concentrations for use in Pilot Rainbow Trout (RBT) surface water toxicity bioassay;
- Reviewed EPA proposal for RBT maximum Pilot Test concentration;
- Participated on BTAG call to discuss RBT maximum Pilot Test concentration;
- Submitted Final Fish and Invertebrate Population report to EPA; and

- Reviewed comments received by EPA on OU3 Phase III SAP.

B. PLANNED ACTIVITIES FOR NEXT TWO MONTHS

The following tasks are scheduled to be performed over the next two months:

- Continue BTAG discussions on Pilot Test for Rainbow Trout surface water toxicity bioassay;
- Continue BTAG discussions on long-term amphibian toxicity bioassay (proposed to replace short-term amphibian toxicity bioassay and a field monitoring program);
- Continue BTAG discussions on histopathology for small mammal tissues;
- Cost field sampling activities at the Libby Site for Spring/Summer 2009 and begin procurement of field sampling equipment.

C. MODIFICATIONS/PROBLEMS ENCOUNTERED/POTENTIAL ISSUES/ ANTICIPATED DELAYS/SOLUTIONS DEVELOPED/IMPLEMENTED

- None.

If you have any questions regarding this progress report, please call Bob Marriam at (901) 820-2023.

Sincerely,



Robert J. Medler
Project Coordinator
Remedium Group, Inc.

cc: Michael DeDen - MWH
Lynne Gardner
John Garr
Catherine LeCours – Montana DEQ
Robert Marriam
Sue Robinson - Parametrix